

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

V.

CIVIL ACTION NO. 1:15-CV-382-HSO-JCG

**VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL D/B/A TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIDUAL CAPACITIES,
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL GEOGRAPHIC
SOCIETY, XYZ FOUNDATION & JOHN
DOES 1-50**

DEFENDANTS

**MOTION FOR EXTENSION OF TIME TO
FILE A RESPONSIVE PLEADING**

COMES NOW Defendant, National Geographic Society, by and through its undersigned counsel of record, Balch & Bingham LLP, and reserving all defenses, files this its Motion for Extension of Time to File a Responsive Pleading in the above-numbered and styled cause and in support thereof would show unto the Court as follows:

1. The National Geographic Society (“National Geographic”) recently hired undersigned counsel to represent National Geographic in the above-captioned action.
2. National Geographic’s Answer and/or responsive pleading is currently due to be filed with this Honorable Court on Wednesday, December 9, 2015.
3. Due to the voluminous issues outlined in the Complaint and the upcoming holidays, counsel for National Geographic respectfully requests an additional twenty-eight (28) days to file an Answer and/or responsive pleading to Plaintiff’s Complaint.

4. Plaintiff has been contacted and has no objection to an extension being granted to counsel for National Geographic for an additional twenty-eight (28) days or by no later than January 6, 2016 to file a responsive pleading.

WHEREFORE, PREMISES CONSIDERED, Defendant, National Geographic Society, respectfully requests this Honorable Court grant it an additional twenty-eight (28) days or by no later than January 6, 2016 to file a responsive pleading in the above-captioned action for the reasons stated above.

Respectfully submitted, this the 7th day of December, 2015.

NATIONAL GEOGRAPHIC SOCIETY

BY: BALCH & BINGHAM LLP

BY: /s/ Jonathan P. Dyal
Of Counsel

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CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to all counsel of record who have registered with the ECF system.

This the 7th day of December, 2015.

/s/ Jonathan P. Dyal
Of Counsel